



MONTGOMERY McCRACKEN

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August 2, 2022

By FAX and ECF

Honorable Alvin K. Hellerstein
United States District Judge
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Fax: (212) 805-7942

Re: *In re MAERSK EINDHOVEN Voyage 103N Shipper Cases* SO ORDERED.
Case No. 21 Civ. 8048 (AKH) (lead case)

Dear Judge Hellerstein,

/s/ Alvin K. Hellerstein
August 2, 2022

We represent defendant Maersk A/S in the above-captioned consolidated cases. On behalf of all the parties, we are writing to respectfully request an additional extension of the pending August 15, 2022 deadline for the parties to file declarations as per the Scheduling Order (ECF No. 13) to **November 15, 2022**.

Specifically, the Scheduling Order requires plaintiffs to file declarations as to the details of the alleged cargo lost and defendants to file declarations “of persons with knowledge” establishing the defenses available to the carriers.

The parties have used the last few months to enter settlement discussions and exchange documents on a without prejudice basis. Several claims have been settled and their corresponding legal actions have already been dismissed. Other settlements will conclude soon. The parties expect to continue diligently working towards the resolution of their claims and defenses and would appreciate the additional time to do so.

This is the second request for an extension of time. The first joint request was granted. (ECF No. 54). This request is also a joint request by all the parties - either on consent or unopposed, respectively.

MONTGOMERY McCRACKEN WALKER & RHOADS LLP

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If the Court grants this request, then the Court may also wish to adjourn the pending September 8, 2022 status conference by the same amount of time, i.e., about 3 months.

We thank Your Honor for your consideration and understanding. If there are any questions or concerns, please do not hesitate to contact the undersigned.

Respectfully submitted,

**MONTGOMERY MCCRACKEN
WALKER & RHOADS, LLP**

Attorneys for Defendant Maersk A/S

/s/ Timothy Semenoro
Timothy Semenoro
Robert E. O'Connor

CC by ECF to all counsel of record